pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

MEMO

TO: Nick Lazor
Environmental Program Manager
Division of Air Quality Monitoring

FROM: Ellen Davies
Environmental Chemist 2
Quality Assurance and Data Assessment Section

DATE: November 27, 2018

RE: Review of MarkWest Harmon Creek Processing Plant QAPP

I have reviewed the *Monitoring & Quality Management Plan/Quality Assurance Project Plan for MarkWest's Harmon Creek Processing Plant Air Toxics Monitoring Stations* document you provided to me. I have reviewed the QAPP for (1) inclusion of applicable Consent Decree requirements as prescribed in Appendix 8 of the Consent Decree (United States of America, and Commonwealth of Pennsylvania, Department of Environmental Protection v. MarkWest Liberty Midstream & Resources, L.L.C., and Ohio Gathering Company, L.L.C., Case 2:18-cv-00520-LPL, Filed 4/24/18) and (2) general adherence to US EPA's *Guidance for Quality Assurance Project Plans EPA QA/G-5* (EPA/240/R-02/009, Dec 2002). My initial comments are provided below.

Review for Inclusion of Appendix 8 Requirements

(1) Requirement 17, Final Report, is not included in the MarkWest QAPP. The Consent Decree states that the Final Report will include interpretation and analysis of the data; this is not addressed in the QAPP.

Review for Adherence to EPA QAPP Requirements and Guidance

(1) General Comments

- PA DEP is not included as a signatory or on the Distribution list. The Consent Decree states EPA will consult with PA DEP prior to issuing approvals. The Consent Decree also states PA DEP will be sent reports.
- Please proof read and make corrections where words are misspelled/inaccurate, and where paragraphs are duplicated.
- Who is the PQAO for this project?
- Please reference the QAPP review checklist to insure all necessary information is included. The checklist can be found on EPA's website [HYPERLINK "https://www3.epa.gov/ttn/amtic/qalist.html"] along with the *Guide to Writing Quality Assurance Project Plans.*

- Throughout the QAPP, the timeline for submitting reports is 60 days following the end of the quarter while the Consent Decree states 45 days.
- The third-party auditor is not identified. In the Consent Decree, there is a section "Third Party Verification" which spells out time-frames and approval by EPA and PA DEP. This section appears to refer to the Third-Party Auditor for the Compressor Stations and Stand-Alone Facilities. However, do the same requirements apply to the Third-Party Auditor for the SEP?

(2) Section-by-Section Comments

A.1 Approval Signatures

a) There are no persons identified on this page for EPA Region 3. Please include the individual names responsible for approving this plan.
b) Please include a statement that commits all responsible parties to adherence to the QAPP.

A.3 Distribution

a) PA DEP is not included in this list but is included in Appendix 8 of the Consent Decree. Please add the appropriate name or names, to the distribution list.
b) There is no mention of how the QAPP will be distributed. Please add a line that describes the format, i.e. hardcopy, electronic.
c) Where will the original copy be kept and will it be a hardcopy or electronic?

A.4 Project/Task Organization

a) The Organizational Chart is missing names for USEPA Region 3 and information for PA DEP representative.
b) Who will perform the annual quality assurance audits? The third-party auditor needs to be identified.

A.5 Problem Definition/Background

a) Climate and topography is stated but the problem is not clearly defined.
b) The QAPP list of compounds to be measured states specific VOCs and then total VOCs. Please clarify the total VOCs that will be measured. Appendix 8, Table A in the Consent Decree should be added to the QAPP.
c) What is the anticipated time frame to begin sampling?
d) How much data is required to complete the project? What happens if acceptable data falls below the anticipated 85% completion mark? Will the project be extended beyond the minimum 720 days as specified in the Consent Decree? These are questions that need to be addressed.

A.6 Project/Task Description

a) Please state the monitoring objective and the work required to run the project.
b) On Page A-14, the last sentence is not a sentence. Please correct.
c) In Table A-3, the Units/Range of Measure for Air Toxics section is confusing. Please clarify the detection range for all compounds.
d) Table A-4, the Project Schedule does not appear to be a complete schedule of the project but describes only the operations portion. Please include a timeline from start to finish.
e) Table A-5 is missing the Final Report that is required per the Consent Decree.

A.7 Quality Objectives and Criteria for Measurement of Data

a) Table A-6 references sections A.6.3 and A.6.2 but these sections do not discuss the sampling frequencies or the sampling locations. Please reference the correct sections.

A.8 Special Training/Certifications

a) Page A-29 states the Siloam monitoring stations. Please use the correct monitoring stations.
b) Please correct the spelling in the second to last line in this section, "presentative."

A.9 Documents and Records

a) How are field maintenance records handled? Are they electronic or are they kept in the field logbook?
b) Final Report is missing from Table -12

B.1 Sampling Process Design

a) VOCs do not have national standards. Therefore, this monitoring project would not comply with the National Ambient Air Quality Standards (NAAQS). Please revise.
b) In addition to 40 CFR Part 58, Appendix E, which is used for siting NAAQS pollutants, the Consent Decree states compliance with the NATTS guidance document. Please include that reference in the QAPP.
c) Please remove duplicate lines.

B.2 Monitoring Equipment and Methods Description

B.2.1 Air Toxic Monitoring Equipment Description

a) Please clarify the end of the first sentence on page B-3, "…and remotely."
b) Please clarify the paragraph that states the detection range for the compounds. The wording is confusing.

B.2.3 Standard Operating Procedures

a) Please correct the Appendices where SOPs are located.

B.4 Analytical Methods

a) Please correct the Appendices SOPs are located.

B.5 Quality Control Requirements

a) On page B-6, second to last line in the first paragraph of this section, "… meets or exceeds the 75% data completeness requirement…" Other areas of the QAPP states 85%. Please clarify and correct.

B.6.2 Site Surveillance and System Check Procedures

a) First sentence says site technician will visit the site monthly while Section B.5.1 says visits will be weekly. Please clarify and correct.

B.7.3 Calibration Forms

a) Please verify and correct Appendices referenced

B.10.10 Data Storage and Retrieval

a) Please add a line that states how long electronic copies of the data will be kept.

C.1 Assessments and Response Actions

a) Who is the independent auditor? This needs to be addressed before the project begins.

C.2 Reports to Management

a) In the Consent Decree, Requirement 17 is a Final Report. Please add the final report to the list.

D.1.2 Level 0 Data Validation

a) The 2nd bullet references Section D.2.2. That section does not exist. Please correct.
b) Is MSI Trinity's QC software validated? If so, how and by whom?

D.1.3 Quality Control Checks for Data Validation

a) What defines "large" when looking at jumps or dips in concentrations? This needs to be defined.

cc: Sean Nolan
Reading File, Air Quality Monitoring Division